

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
HARRISONBURG DIVISION

CARY HIXSON,	)	
	)	
Plaintiff,	)	
v.	)	Case No.: 5:17-cv-00032
	)	Consolidated with Case No.:
BRYAN HUTCHESON, et. al.,	)	5:18-cv-00001
	)	
	)	
Defendants.	)	

**NOTICE OF STIPULATION OF DISMISSAL OF DEFENDANTS JANELLE  
SEEKFORD, KATHERINE RAYNES, AND SOUTHERN HEALTH  
PARTNERS**

COMES NOW Plaintiff, Cary Hixson, through counsel and pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, and hereby stipulate to the voluntary dismissal with prejudice of Defendants Janelle Seekford, Katherine Raynes, and Southern Health Partners (“SHP”) from this action. The parties further agree that no attorney’s fees or costs will be pursued by Defendants Raynes, Seekford, or SHP against Plaintiff and that no attorney’s fees or costs will be pursued by Plaintiff against Defendants Raynes, Seekford, or SHP.

Respectfully submitted this 15<sup>th</sup> day of November 2018,

/s/MARIO B. WILLIAMS  
Mario B. Williams (VSB #91955)

/s/ ANDREW R. TATE  
Andrew R. Tate (GA # 518068)

NEXUS DERECHOS HUMANOS ATTORNEYS, INC.  
44 Broad Street, NW, Suite 200  
Atlanta, Georgia 30303  
(404) 254-0442 / (703) 935-2453 FAX  
mwilliams@ndhlawyers.com  
atate@ndhlawyers.com  
*Counsel for Plaintiff*

/s/  
Susan A. Waddell (VSB #24302)  
Jim H. Guynn, Jr. (VSB #22299)

**GUYNN & WADDELL, P.C.**  
415 S. College Avenue  
Salem, Virginia 24153  
540-387-2320/540-389-2350 FAX  
susanw@guynnwaddell.com  
jimg@guynnwaddell.com  
*Counsel for Defendant Dr. Moran*

/s/  
John C. Johnson (VSB # 33133)  
Katherine M. DeCoster (VSB # 82696)

**FRITH ANDERSON & PEAKE PC**  
29 Franklin Road, SW  
Roanoke, VA 24011  
540-772-4600/540-772-9167 FAX  
jjohnson@faplawfirm.com  
kdecoster@faplawfirm.com  
*Counsel for Defendants Southern Health Partners, Inc., Katherine Raynes and Janelle Seekford*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing NOTICE OF STIPULATION OF DISMISSAL OF DEFENDANTS JANELLE SEEKFORD, KATHERINE RAYNES, AND SOUTHERN HEALTH PARTNERS with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

Respectfully submitted this 15<sup>th</sup> day of November 2018,

/s/MARIO B. WILLIAMS  
Mario B. Williams (VSB #91955)

/s/ ANDREW R. TATE  
Andrew R. Tate (GA # 518068)

NEXUS DERECHOS HUMANOS ATTORNEYS, INC.  
44 Broad Street, NW, Suite 200  
Atlanta, Georgia 30303  
(404) 254-0442 / (703) 935-2453 FAX  
mwilliams@ndhlawyers.com  
atate@ndhlawyers.com  
*Counsel for Plaintiff*